

knowledge and experience in the field of education generally and my work as the Chancellor of UNVA specifically.

3. I hold a Doctorate Degree in Higher Education Administration (1991) from George Washington University, a Masters Degree in Vocational Education Administration (1971); and a Bachelors of Business Administration (1967) from Parsons College. I am the co-founder of UNVA. Prior to co-founding and working for UNVA, I served, among other roles, as Dean of Academic Affairs of Southeastern University in 1997 and Dean of Business Technologies (1973-1996). In total, I have over thirty years of experience in the field of higher education, and over fifteen years of experience in the field of international higher education.
4. UNVA has placed considerable resources into the accreditation process to be sure we meet all the criteria as stated by ACICS and has submitted all the required reports and self study. Accreditation is the foundation on which we have built our programs, and has been a primary enabler of our growth.
5. UNVA's denial of accreditation by the Accrediting Council for Independent Schools & Colleges (ACICS) will have a noticeable and negative impact on the Virginia Campus and on all overseas branch campuses. ACICS's accreditation of UNVA is critically important to its overseas campuses. Students enroll at our campuses overseas in order to obtain a high quality American education from an institution that is accredited in the United States. The message that denial of accreditation sends to current and potential students is that UNVA is not of high quality, which is untrue. The damage

caused by this denial to the reputation of UNVA is extremely high.

Information about the denial will spread quickly, and it will not be possible for us to fully repair our reputation even if there were a favorable resolution of the accreditation status in the litigation.

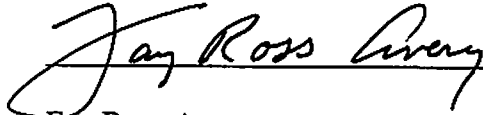
6. ACICS's denial of accreditation will directly harm the ability of branch campuses to recruit new students. Underlying all of our recruiting efforts is the fact that we are accredited in the United States. It is extremely important to potential students that we are accredited. As an unaccredited school, our recruitment efforts will be severely harmed. The lack of accreditation may result in the closing of most, if not all of our branch campuses.
7. The lack of accreditation will also negatively impact our current students enrolled overseas who are in the middle of degree programs. They will not be receiving a degree from an accredited American university. As a result of this many of them may discontinue their studies. It is extremely unlikely that a student who leaves the school would return even if there were a fair and favorable resolution of our accreditation status. In most cases the student would be continuing their education elsewhere, and the trust and good will established between the students and UNVA would have been damaged beyond repair.
8. In the Virginia campus, UNVA's denial of accreditation has had an immediate, harmful impact. UNVA has been in the process of purchasing two new buildings and a 3.4 acre campus in Manassas, Virginia. UNVA has attempted to maintain good relations with the surrounding business and

general community as we prepare to move into our new facilities. The good will engendered with the City of Manassas, Virginia during the process of obtaining a special exception to have a campus at the new property and our reputation in the local community and in the education community throughout the United States and the world will be irreparably harmed.

9. UNVA needs accreditation in order to qualify its students for federal financial aid. Although UNVA does not currently rely upon federal financial aid, it desires to become eligible for federal financial aid in the future. Accreditation by an accrediting organization recognized by the U.S. DOE is required in order for UNVA's students to qualify for federal financial aid. Denial of accreditation by ACICS precludes UNVA from seeking or qualifying for federal financial aid.
10. Presently, the rate of applications received is down approximately eighty percent from last term. At this rate, many of our employees will have to be laid off, teachers who we have spent years recruiting will leave, academic programs and student support services will have to be drastically cut. Additionally, the loss of revenue would result in UNVA defaulting on many of its outstanding commitments, such as the eight million dollar real estate contract for the purchase of the new buildings and a one and a half million dollar contract with CISCO Systems.
11. UNVA may not survive through the end of the litigation if its accreditation is not restored. If it does survive, irreparable damage will still have been done and it will take years to recover. Students currently in degree programs will

not have credits which will be transferable to other institutions. Students who
have already graduated will find that their degrees have lost significant value.

I declare, under the penalty of perjury, that the foregoing is true and correct.

 10-19-07
Fay Ross Avery